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United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN ZAMORA TORRES,
JULIO MENDOZA MADRIGAL,
DORIAN MICHAEL WILLES,
ROBERT LEWIS MCCOMMAS, and
HEATHER LEIGH ROMOSER,

Defendant.

CASE NO. 2:21-CR-00110-JAM

ORDER REGARDING
GOVERNMENT'S DISCLOSURE OF SENSITIVE
MATERIALS AND PERSONAL
IDENTIFICATION INFORMATION TO
DEFENDANT HEATHER LEIGH ROMOSER

The Court has received and considered the jointly-filed Stipulation Regarding Disclosure of Sensitive Materials and Personal Identifying Information between Plaintiff United States of America, by and through its counsel of record, the United States Attorney for the Eastern District of California, and defendant HEATHER LEIGH ROMOSER (hereinafter, "defendant"), by and through her counsel of record, Toni LaShay White.

Good cause showing, IT IS HEREBY ORDERED THAT:

1. The government will identify the discovery materials in this case the disclosure of which could jeopardize the safety of witnesses or other persons or affect the confidentiality of ongoing investigations (the "Sensitive Materials").

2. The government will mark all Sensitive Materials with the following stamp or

1 inscription: “SENSITIVE MATERIALS”

2 3. If the government distributes any document, compact disk, or other material bearing the
3 above label:

4 a. Defense counsel shall not distribute Sensitive Materials to anyone other than their
5 own legal staff (including paralegal assistants, legal secretaries, defense investigators, and lawyer-
6 associates);

7 b. Defense counsel shall not allow anyone other than themselves and their legal staff
8 to possess, or maintain possession of, any Sensitive Materials;

9 c. Defense counsel or their legal staff may show defendant Sensitive Materials, but
10 may not allow defendant to possess Sensitive Materials other than in the presence of defense counsel or
11 their legal staff;

12 d. Defendant shall not distribute the sensitive materials to anyone;

13 e. Defense counsel and defendant may not disclose the contents of any Sensitive
14 Materials publicly, including in any court filing, without first meeting and conferring with government
15 counsel, and, in any event, shall file any Sensitive Materials under seal.

16 4. The parties must confer before filing any motions regarding the government’s disclosure
17 (or lack of disclosure) of Sensitive Materials.

18 5. The evidence in this matter also includes personal identification information for others,
19 including but not limited to names, addresses, dates of birth, social security numbers and bank account
20 numbers (collectively “personal information”).

21 6. This personal information is found throughout the discovery in this case, which includes,
22 among other records, thousands of pages of records from banks, other financial institutions, businesses
23 and police departments.

24 7. IT IS FURTHER ORDERED THAT:

25 a. Only defense counsel, defense counsel’s agents, and the defendant may review
26 the unredacted personal information contained in the discovery. Defense counsel, defense counsel’s
27 agents and defendant may only use the unredacted personal information or any portion thereof for the
28 specific purpose of preparing or presenting a defense in this matter and for no other purpose.

1 8. Only defense counsel and defense counsel's agents may make copies of any discovery
2 containing unredacted personal information; the defendant may make copies for their own use only of
3 any discovery containing unredacted personal information that has been provided to them by their
4 defense counsel or their defense counsel's agents, and may not release any such copies to any third
5 party.

6 9. At the conclusion of this matter, defense counsel will collect and destroy any and all
7 copies of documents and portions thereof containing the personal information that defense counsel
8 possesses and/or has made and distributed to their agents and/or defendant, except a copy set as
9 necessary to maintain in defense counsel's case file.

10 10. This Order shall apply to unredacted personal information contained in all discovery
11 produced in this case, including any discovery produced after entry of this Order.

12
13 IT IS SO ORDERED.

14 Dated: August 27, 2021



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE